

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GENOA COLOR TECHNOLOGIES, LTD.,

Plaintiff,

v.

MITSUBISHI ELECTRIC CORP.; MITSUBISHI
ELECTRIC US HOLDINGS, INC.; MITSUBISHI
ELECTRIC AND ELECTRONICS USA, INC.;
MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC.;
SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG
ELECTRONICS AMERICA, INC.,

Defendants.

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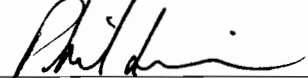
No. 07 CIV 6233 (PKC)

ECF Case

**NOTICE OF MOTION TO
ADMIT COUNSEL *PRO*
*HAC VICE***

PLEASE TAKE NOTICE that, upon the annexed declarations of Philip A. Irwin, Roderick R. McKelvie, and Gregory Discher, and the exhibits attached thereto, and with the consent of counsel for Plaintiff Genoa Technologies, Ltd., Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., by and through their undersigned counsel, will move this Court, as soon as counsel may be heard, for an Order pursuant to Local Civil Rule 1.3(c) of this Court admitting Roderick R. McKelvie and Gregory Discher *pro hac vice* in connection with the above-captioned action, and for such other and further relief as the Court may deem just and proper.

COVINGTON & BURLING LLP



Philip A. Irwin
620 Eighth Avenue
New York, NY 10018
(212) 841-1000

Dated: New York, New York
September 10, 2007

*Attorneys for Defendants Samsung Electronics
Co., Ltd. and Samsung Electronics America,
Inc.*

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENOA COLOR TECHNOLOGIES, LTD.,

Plaintiff,

v.

MITSUBISHI ELECTRIC CORP.; MITSUBISHI
ELECTRIC US HOLDINGS, INC.; MITSUBISHI
ELECTRIC AND ELECTRONICS USA, INC.;
MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC.;
SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG
ELECTRONICS AMERICA, INC.,

Defendants.
----- x

No. 07 CIV 6233 (PKC)

ECF Case

**DECLARATION OF
PHILIP A. IRWIN**

Pursuant to 28 U.S.C. § 1746, I, Philip A. Irwin, declare:

1. I am an attorney with the law firm of Covington & Burling LLP, attorneys for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. I submit this declaration in support of Defendants' Motion to Admit Counsel *Pro Hac Vice* in connection with this action pursuant to Local Civil Rule 1.3(c).


2. By reputation and experience, I know Messrs. McKelvie and Discher to be attorneys of good character, competence, and experience. I am confident that they will conduct themselves accordingly before this Court.

3. In connection with this application, I am submitting declarations of Messrs. McKelvie and Discher in which they describe their experience and familiarity with the Judicial Code governing practice in the United States District Courts, Federal Rules of Civil Procedure, Federal Rules of Criminal Procedure, Federal Rules of Evidence, and Local Rules governing practice in this Court. Attached to the declarations as exhibits are Certificates of Good Standing issued within the last thirty days from the state bars in which Counsel are admitted.

4. For the foregoing reasons, I respectfully request that Defendants' motion be granted. For the Court's convenience, a proposed order granting the motion to admit Counsel *pro hac vice* is annexed hereto as Exhibit A.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 10, 2007, in New York, New York:


Philip A. Irwin

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
GENOA COLOR TECHNOLOGIES, LTD.,

Plaintiff,

v.

MITSUBISHI ELECTRIC CORP.; MITSUBISHI
ELECTRIC US HOLDINGS, INC.; MITSUBISHI
ELECTRIC AND ELECTRONICS USA, INC.;
MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC.;
SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG
ELECTRONICS AMERICA, INC.,

Defendants.
----- X

No. 07 CIV 6233 (PKC)

ECF Case

**ORDER ADMITTING
COUNSEL *PRO HAC*
VICE**

This matter having been brought before the Court by Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., through its counsel Covington and Burling LLP, by motion pursuant to Local Civil Rule 1.3(c) for an order admitting Roderick R. McKelvie and Gregory Discher *pro hac vice*, with the consent of Plaintiff Genoa Color Technologies, Ltd. and on notice to all parties of record hereto, and the Court having reviewed and considered the papers filed in support of this Motion, it is hereby

ORDERED that Roderick R. McKelvie and Gregory Discher be and hereby are admitted *pro hac vice* in connection with this action and shall abide by the provisions of the Local Rules of this Court in all respects and be subject to the disciplinary jurisdiction of the Court in accordance with Local Civil Rule 1.5.

SO ORDERED:

U.S.D.J. Date: _____

CERTIFICATE OF SERVICE

I hereby certify that I caused true copies of the foregoing Notice of Motion to Admit Counsel *Pro Hac Vice* dated September 10, 2007; the Declaration of Philip A. Irwin dated September 10, 2007 and the exhibit attached thereto; the Declaration of Roderick R. McKelvie dated August 28, 2007 and the exhibits attached thereto; the Declaration of Gregory S. Discher dated September 6, 2007 and the exhibits attached thereto; and the proposed Order Admitting Counsel *Pro Hac Vice*, to be served by United States Mail, first class postage pre-paid, on the following attorneys of record to the within action (No. 07 CIV 06233 (PKC)) on this 10th day of September, 2007.

Sibley P. Reppert
Lahive & Cockfield LLP
One Post Office Square
Boston, MA 02109

Vincent J. Belusko
Morrison & Foerster
555 West 5th Street
Los Angeles, CA 90013-1024


Lee A. Goldberg
Nathaniel Buchek
Pearl Cohen Zedek Latzer LLP
1500 Broadway, 12th Floor
New York, NY 10036

James E. Hough
Morrison & Foerster
1290 Avenue of the Americas
New York, NY 10104-0050

Attorneys for Plaintiff

Attorneys for Defendants Mitsubishi Electric Corp., Mitsubishi Electric US Holdings, Inc., Mitsubishi Electric and Electronic USA, Inc., and Mitsubishi Digital Electronics America, Inc.

Dated: New York, New York
September 10, 2007


Philip A. Irwin

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GENOA COLOR TECHNOLOGIES, LTD.,

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Defendants.

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x

No. 07 CIV 6233 (PKC)

ECF Case

**DECLARATION OF
GREGORY S. DISCHER**

Pursuant to 28 U.S.C. § 1746, I, Gregory Discher, declare:

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. in this matter. My current office address is 1201 Pennsylvania Avenue, NW, Washington, DC 20004.

2. I submit this declaration in support of Defendants' Motion to Admit Counsel *Pro Hac Vice* in connection with the above captioned matter.

3. I have been admitted to practice law in Virginia since 1996 and in the District of Columbia since 2001. As shown in the Certificates of Good Standing annexed hereto as Exhibits A and B, I am currently a member in good standing of the bars of both Virginia and the District of Columbia.

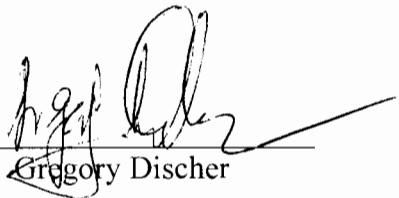
4. I have been admitted to practice in the following courts: United States Court of Appeals for the Fourth Circuit. There are no pending disciplinary proceedings against me in any state or federal court.

5. I have read and am familiar with (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and the practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Criminal Procedure; and (d) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

6. I will faithfully adhere to all rules applicable to my conduct in connection with any activities of this Court.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 6, 2007, in Washington, DC.



Gregory Discher

Howard W. Martin, Jr., President
Crenshaw, Ware & Martin, P.L.C.
1200 Bank of America Center
Norfolk, VA 23510-2111
Telephone: (757) 623-3000

Manuel A. Capsalis, President-elect
Capsalis, Bruce & Reaser, P.L.C.
2200 Wilson Boulevard, Suite 800
Arlington, VA 22201
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Karen A. Gould, Immediate Past President
McSweeney, Crump, Childress & Gould, P.C.
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Richmond, VA 23219
Telephone: (804) 545-2415

George W. Chabalewski
Bar Counsel



Virginia State Bar

Eighth and Main Building
707 East Main Street, Suite 1500
Richmond, Virginia 23219-2800
Telephone: (804) 775-0500

Facsimile: (804) 775-0501 TDD: (804) 775-0502

Thomas A. Edmonds
Executive Director and
Chief Operating Officer

Mary Yancey Spencer
Deputy Executive Director

Elizabeth L. Keller
Assistant Executive Director
for Bar Services

Susan C. Busch
Assistant Executive Director
for Administration

August 22, 2007

CERTIFICATE OF GOOD STANDING

*THIS IS TO CERTIFY THAT **GREGORY SCOTT DISCHER** IS AN
ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING.*

***MR. DISCHER** WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON
OCTOBER 15, 1996, AFTER SUCCESSFULLY PASSING THE BAR
EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.*

SINCERELY,

A handwritten signature in black ink, reading "Thomas A. Edmonds".

THOMAS A. EDMONDS
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

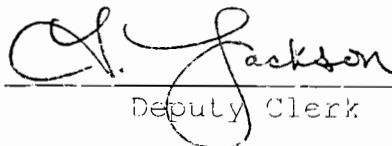
I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

GREGORY SCOTT DISCHER

was on the 14TH day of SEPTEMBER, 2001
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on August
13, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that


RODERICK R. MCKELVIE

was on the 9TH day of MAY, 2003

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on August
30, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

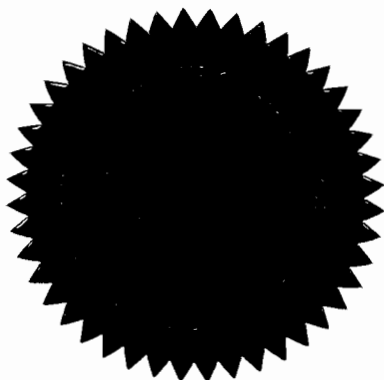
SUPREME COURT OF THE STATE OF DELAWARE

CERTIFICATE OF GOOD STANDING

The Clerk of the Supreme Court of the State of Delaware, the highest Court in the State, certifies that **Roderick R. McKelvie** was admitted to practice as an attorney in the Courts of this State on **November 20, 1973**, and is an **active** member of the Bar of the Supreme Court of the State of Delaware in good standing.

IN TESTIMONY WHEREOF,

I have hereunto set my hand and affixed the seal of said Court at Dover this 30th day of August 2007.



A handwritten signature in cursive script, reading "Cathy L. Howard". The signature is written in black ink and is positioned above a horizontal line.

Cathy L. Howard
Clerk of the Supreme Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GENOA COLOR TECHNOLOGIES, LTD.,

Plaintiff,

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MITSUBISHI ELECTRIC CORP.; MITSUBISHI
ELECTRIC US HOLDINGS, INC.; MITSUBISHI
ELECTRIC AND ELECTRONICS USA, INC.;
MITSUBISHI DIGITAL ELECTRONICS AMERICA, INC.;
SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG
ELECTRONICS AMERICA, INC.,

Defendants.
----- x

No. 07 CIV 6233 (PKC)

ECF Case

**DECLARATION OF
RODERICK R.
MCKELVIE**

Pursuant to 28 U.S.C. § 1746, I, Roderick R. McKelvie, declare:

1. I am a partner of the law firm of Covington & Burling LLP, counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. in this matter. My current office address is 1201 Pennsylvania Avenue, NW, Washington, DC 20004.

2. I submit this declaration in support of Defendants' Motion to Admit Counsel *Pro Hac Vice* in connection with the above captioned matter.

3. I have been admitted to practice law in the District of Columbia since 2003 and in Delaware since 1973. As shown in the Certificates of Good Standing annexed hereto as Exhibits A and B, I am currently a member in good standing of the bars of both the District of Columbia and Delaware.

4. I have been admitted to practice in the following courts:

District of Columbia Court of Appeals
Delaware Supreme Court
U.S. District Court for the District of Columbia
U.S. Supreme Court

U.S. Court of Appeals for 3rd Circuit

U.S. Court of Appeals for Federal Circuit

U.S. District Court for the Eastern District of Michigan.

There are no pending disciplinary proceedings against me in any state or federal court.

5. I have read and am familiar with (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and the practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Criminal Procedure; and (d) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

6. I will faithfully adhere to all rules applicable to my conduct in connection with any activities of this Court.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 28, 2007, in Washington, DC.


Roderick R. McKelvie